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October 5, 2017

VIA ECF

The Honorable Leda Dunn Wettre
United States District Court
District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Courtroom MLK 2A
Newark, NJ 07101

Re: Alberto Rivera and Mansour Cherif v. EZ Limousine LLC, et al.
Case No. 2:17-cv-01483-MCA-LDW

Dear Judge Wettre:

The undersigned represents Defendants EZ Limousine LLC and Aleksandr Malts (collectively "Defendants") in the above-reference action. In accordance with Your Honor's Pretrial Scheduling Order, Section IV, ¶ 7, please accept this as Defendants' status letter, filed in anticipation of the telephonic status conference, scheduled for October 16, 2017.

Plaintiffs Alberto Rivera and Mansour Cherif ("Plaintiffs") and Defendants served their initial discovery requests on June 30, 2017 and July 3, 2017, respectively. Defendants required additional time to respond and the parties agreed to a mutual thirty (30) day extension of deadlines. The parties have since exchanged responses and objections to written discovery, as well as hundreds of pages of documents. Further, Plaintiffs and Defendants both served one other with deficiency letters on September 7, 2017 and September 12, 2017, respectively. Defendants responded to Plaintiffs' letter on September 22, 2017 and Plaintiffs responded to Defendants' letter on September 29, 2017. The parties continue to search for, and produce, relevant documents on a rolling basis.

As fact discovery is currently scheduled to close on December 15, 2017, and written discovery has been largely completed, the parties are now scheduling depositions for mid-late November. However, if Plaintiffs are amenable, Defendants respectfully propose that the Court extend the discovery deadline by thirty (30) to sixty (60) days and schedule a settlement conference, to take place sometime in October or November 2017, at the Court's convenience. This would provide

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the parties with an opportunity to attempt to resolve this matter early on, prior to investing the substantial time and money involved in conducting depositions.

Should Your Honor require any further information, please do not hesitate to contact my office.

Respectfully submitted,

CONSTANGY, BROOKS, SMITH & PROPHETE, LLP

John E. MacDonald

cc: Edgar Rivera, Esq. (*via ECF*)